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Attorney for Defendant
REGINALD THOMAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

REGINALD THOMAS,

Defendant.

Case No.: 2:20-CR-00012 MCE

**STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE**

Date: November 15, 2021
Time: 10:00a.m.
Court: Hon. John A. Mendez

STIPULATION

Defendant Reginald Thomas, by and through his undersigned counsel, and Plaintiff United States of America, by and through its counsel of record, hereby stipulate and request that the Status Conference previously set for November 15, 2021 be continued to December 14, 2021, at 9:30am. The defendant further agrees to waive time under the Speedy Trial Act pursuant to Local Code T4, defense preparation, up and through the December 14, 2021 date.

In support of this stipulation, the parties request that the Court find the following:

1. By previous order, this case, along with defendant's related case (2:11-CR-00216), was special set for status on November 15, 2021. On November 4, 2021, however,

- 1 both of defendant's cases were reassigned to the Honorable John A. Mendez.
- 2 2. Counsel for the defendant was initially appointed on June 22, 2021, following two
- 3 prior CJA attorneys in this case. Since then, the government has represented that the
- 4 discovery associated with this case includes numerous reports and related
- 5 documents, photographs, audio recordings, and videos, and that all such discovery
- 6 has been either produced directly to counsel and/or made available for inspection
- 7 and copying.
- 8 3. At this time, counsel for defendant requires additional time to conduct investigation
- 9 and research related to the charges, review discovery for this matter, discuss
- 10 potential resolutions, and to otherwise prepare for trial.
- 11 4. The parties stipulate that the failure to grant the above-requested continuance would
- 12 deny defense counsel reasonable time necessary for effective preparation, taking
- 13 into account the exercise of due diligence.
- 14 5. For the purposes of calculating time under the Speedy Trial Act, 18 U.S.C. § 3161,
- 15 et seq., the parties agree and request that the time period from November 15, 2021
- 16 to December 14, 2021, inclusive, be excluded under 18 U.S.C. § 3161(h)(7)(A),
- 17 B(iv) [Local Code T4] upon such finding by the Court that the ends of justice
- 18 served by taking such action outweigh the best interest of the public and the
- 19 defendant in a speedy trial.

20 IT IS SO STIPULATED.

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22 Dated: November 10, 2021

/s/ ETAN ZAITSU

23 ETAN ZAITSU
24 Counsel for Defendant
25 REGINALD THOMAS
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1 Dated: November 10, 2021

PHILLIP A. TALBERT
Acting United States Attorney

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4 /s/ TANYA B. SYED
TANYA B. SYED
Assistant United States Attorney

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11 **FINDINGS AND ORDER**

12 IT IS SO FOUND AND ORDERED this 12th day of November, 2021.

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14 /s/ John A. Mendez
15 THE HONORABLE JOHN A. MENDEZ
16 UNITED STATES DISTRICT COURT JUDGE
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